

National Strategy Regional Oversight Plans Region 1 – April 2014

| PROGRAM | Significant Issue | Corrective Measures/Escalation Approach with Timeframes |
|-----------|---|---|
| All Media | <p><u>DATA ISSUES</u></p> <p>In September 2013, Region 1 finalized our SRF review report of VT for FY11. Region 1 completed its draft Round 3 SRF report for Rhode Island for FY12 in March 2014. For both reviews, the most prevalent and significant issues (i.e., Areas for State Improvement) revolve around data issues. Incomplete data, inaccurate data, the timeliness of data entry were all identified as issues in both SRF reviews. None of the issues are insurmountable nor are they unique to Vermont and Rhode Island. Data issues cut across all media programs and all states.</p> <p>More significantly, several Region 1 states recently voiced strong concern with the upcoming transition from AFS to ICIS-Air this fiscal year. These states and others nationally are finding great difficulty maintaining the level of effort required to ensure a smooth transition. Specific tasks include the review and correction of data inconsistency reports, computer programming of data translators to allow state systems to export data into ICIS-Air and to allow ICIS-Air to receive the data, and training for direct users of ICIS-Air given that it is not expected to be operational until July at best. Region 1's air unit is expending significant resources to assist our states, taking away from other work, and our states have expressed the same concern.</p> | <p>For issues that are identified in each SRF review, including data issues, the Region is initiating a process to conduct quarterly check-in discussions with each state to track the progress on correcting any identified issues. Some issues may take several quarters or years to resolve. Regardless, quarterly check-ins will serve to keep issues identified in each SRF at the forefront.</p> <p>State concerns with the transition from AFS to ICIS-Air were recently summarized in a February 20, 2014 letter from the interstate environmental organization Northeast States for Coordinated Air Use Management (NESCAUM) to OECA. Since then, we have heard that other states outside of Region 1 have also expressed similar concerns. As OECA considers a response to the letter, Region 1 is available to discuss the issues raised by NESCAUM.</p> |

| | | |
|-----------|---|---|
| All Media | <p><u>STATE RESOURCES</u></p> <p>Region 1 states have suffered from the loss of key enforcement staff in recent years. They continue to be able to conduct the minimum program requirements identified by the SRF, but they rely on Region 1 in some important program areas. For example, RIDEM air enforcement staff do not observe stack tests as every other state does. Region 1 air enforcement staff perform these observations. The issue of the need for additional state enforcement resources was also recently noted in Vermont's recently finalized SRF report.</p> | <p>Region 1 meets with and discusses program staffing concerns with our states on a regular basis. Region 1 program staff and managers in each media monitor the capacity of each state's ability to implement effective enforcement programs. When a key staffing issue arises, this is elevated within the Region. There are no state staffing issues that currently rise to the level of a critical state implementation gap, but we continue to be concerned that this could occur in the future.</p> |
|-----------|---|---|